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Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SHENDONNA SOPHIA McLAIN,  
Plaintiff,  
v.  
CLARK COUNTY, NEVADA; *et. al.*,  
Defendants. } Case No. 2:14-cv-0288-JAD-GWF

**STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

**(SECOND REQUEST)**

Pursuant to Federal Rules of Civil Procedure 6(b) and the Court's Local Rule of Civil Practice ("LRCP") 7-1, the parties respectfully request that the Court extend the current deadline for Plaintiff to respond to Defendants' motions for summary judgment (Pacer #109 and #110) to and until April 18, 2017 (Tuesday). This is the parties' second request for an extension of time. Plaintiff's current deadline is April 3, 2017.

In support of this stipulation, the parties wish to advise the Court of the following:

1. This is a civil rights case involving five separate Defendants. Each Defendant moved for summary judgment on January 30, 2017.

1           2. Plaintiff's counsel has requested counsel for Defendants agree to this  
2 stipulation based upon his current trial/work schedule and the need to devote sufficient time to  
3 preparing responses to Defendants' dispositive motions. In support of this request, Plaintiff's  
4 counsel cites the fact that he has been in trial since March 20, 2017 in David Moradi v. Nevada  
5 Property 1, LLC, et. al., Clark County District Court (case number A-14-698824-C). Trial in that  
6 matter is ongoing and expected to last approximately two more weeks. Although undersigned  
7 counsel is not the sole attorney representing Plaintiff in the Moradi case, his presence at trial  
8 proceedings is required.

9           3. Counsel for Defendants do not oppose Plaintiff's request for additional time to  
10 respond to the dispositive motions provided they are allowed 30-days to file a reply to any  
11 response that may be filed by Plaintiff. Obviously, given his own request, Plaintiff's counsel has  
12 no issue with providing Defendants additional time to file replies.

13          4. The additional time requested herein should provide sufficient time for Plaintiff's  
14 counsel to complete and file an appropriate response.

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5. The parties respectfully request that the Court approve this stipulation.

Respectfully submitted,

/s/ Lucinda L. Common

/s/ Paul S. Padda

Lucinda L. Coumou, Esq.  
Chief Deputy District Attorney, Civil Division  
Clark County District Attorney's Office

Paul S. Padda, Esq.  
Paul Padda Law

Attorney for Defendant Clark County, Nevada

Attorney for Plaintiff

Dated: April 3, 2017

Dated: April 3, 2017

/s/ Noel E. Eidsmore

Robert W. Freeman, Jr., Esq.

Noel E. Eidsmore, Esq.

Lewis Brisbois Bisgaard & Smith

Attorney for Officers Friedman and Zaccara

and the Las Vegas Metropolitan Police Department

Dated: April 3, 2017

## **IT IS SO ORDERED:**

The Court hereby approves the parties' stipulation for extension of the current deadline for responding to the motions for summary judgment filed on January 30, 2017 (Pacer #109 and #110). Plaintiff's responses shall be due on or before April 18, 2017 and each Defendant shall have 30-days after Plaintiff files a response to submit a reply (if any).

UNITED STATES DISTRICT JUDGE

Dated: April 4, 2017.